

EXHIBIT E

JJHCS INDEX IN SUPPORT OF MOTION TO SEAL PORTIONS OF SAVEONSP'S MOTION TO COMPEL JJHCS TO ADD
INCELLI AND KHALIL AS CUSTODIANS (ECF NOS. 356, 378 & 388)

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson regarding SaveOnSP's Motion to Compel JJHCS to add Incelli and Khalil as custodians, dated August 26, 2024 (ECF No. 356)</u>		JJHCS requests the redaction of information in and exhibits to the August 26 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	<p>If filed on the public docket, these portions of the August 26 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.</p> <p>Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS</p>	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 2, 3, 4, 5, 6, 7, 8 & 9; Notes 2, 3 & 4	Redactions discussing confidential exhibits					

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Exhibit 1	Redactions to JJHCS's responses and objections to SaveOnSP's request for production of documents reflecting confidential business information		because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			

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Exhibits 5, 6, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 28, 29, 30, 31, 32 & 33	Sealing of emails and attachments and other communications reflecting confidential business information					
Exhibit 7	Sealing of hearing transcript reflecting confidential business information					

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Exhibits 25, 26 & 27	Redactions to discovery letters discussing confidential documents					
<u>Letter from Jeffrey J. Greenbaum to Judge Wolfson in opposition to SaveOnSP's motion to compel, dated September 10, 2024 (ECF No. 378)</u>		JJHCS requests the redaction of information in and exhibits to the September 10 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the September 10 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary information would cause irreparable	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 2, 4, 6, 7, 8, 9, 10, & 11; Notes 1 & 2	Redactions discussing confidential exhibits					

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Exhibits 1, 2 & 3	Redactions to discovery letters discussing confidential documents		harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			

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<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson in reply to JJHCS's opposition to SaveOnSP's motion to compel, dated September 19, 2024 (ECF No. 388)</u>		JJHCS requests the redaction of information in and exhibits to the September 19 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	<p>If filed on the public docket, these portions of the September 19 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.</p> <p>Disclosure to the public of this confidential and proprietary information would cause irreparable</p>	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	The redactions to Exhibit 40 were previously approved in connection with ECF No. 342.	None.
Pages 2, 3, 4, 5, 6, 7, 8 & 9; Notes 2, 3, 4, 6 & 7	Various redactions discussing confidential exhibits					

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Exhibits 35, 36, 37, 38, 39 & 41	Sealing of emails, attachments, and presentations reflecting confidential business information		harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			
Exhibit 40	Redactions to hearing transcript reflecting confidential business information					
Exhibit 42	Redactions to discovery letter discussing confidential information					

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Exhibit 43	Redaction to letter in opposition to motion to compel searches concerning mitigation					